

May 6, 2004

FINDING OF NO SIGNIFICANT IMPACT

TO ALL INTERESTED GOVERNMENT AGENCIES AND PUBLIC GROUPS:

In accordance with the environmental review guidelines of the Council on Environmental Quality found at 40 Code of Federal Regulations (CFR) Part 1500 and with the use as guidance of the implementing environmental review procedures of the United States Environmental Protection Agency (EPA) found at 40 CFR Part 6 entitled "Procedures for Implementing the Requirements of the Council on Environmental Quality on the National Environmental Policy Act", the EPA has performed an environmental review of the following proposed action.

Proposed Improvements to the Wastewater Treatment System
for the
City of New Iberia
Located in Iberia Parish, Louisiana

EPA Project Number: XP-986952-01

Estimated EPA Share Fiscal Year 2001:	\$ 967,833
Estimated EPA Share Fiscal Year 2002:	\$ 291,000
Estimated EPA Share Fiscal Year 2003:	\$ 173,500
Total Estimated EPA Share:	\$1,432,333

The Fiscal Years 2001, 2002, and 2003 Appropriations Act for the EPA included special Congressional funding for water and wastewater construction projects. The funding recipient was selected to receive funding through these special appropriations for the construction of new wastewater treatment facilities to replace their existing Admiral Doyle Drive treatment plant, and for the rehabilitation of their Parker Street treatment plant. The city of New Iberia (city) and Sewerage District 1 of Iberia Parish are served by both existing wastewater treatment facilities. Both existing treatment facilities currently have adequate capacity to properly treat the flows generated by the residents in the area through the planning period of 2021, but will be unable to meet future effluent limits that will be required for the facilities. The new effluent limits are significantly more stringent than when the facilities were first designed and constructed in 1942 and 1984, respectively.

Both facilities become overloaded due to excessive dry weather infiltration, and wet weather infiltration and inflow, and have experienced overflows of raw wastewater into the local environment. To correct this situation and to comply with future discharge permit limits, the city is proposing the construction of a new wastewater treatment plant capable of treating a wastewater flow of 6 million gallons per day to replace the Admiral Doyle Drive treatment plant, and the construction of equalization basins at the Parker Street treatment plant. The city is

completed surrounded by Sewerage District 1 which includes other urban and rural areas, and the Acadiana Regional Airport.

The new treatment facilities to replace the Admiral Doyle Drive treatment plant will utilize Sequencing Batch Reactor technology which will automate the wastewater treatment process. Sludge treatment facilities will continue to be located at the Parker Street plant after the installation of additional sludge processing facilities, but a sludge storage tank will be constructed at the new facilities. This will allow sludge wasting and storage prior to transport for treatment and processing at the Parker Street facilities. The city has been issued numerous Administrative Orders by EPA regarding the inability of both plants to comply with the effluent limits and requirements contained in their discharge permits. Failure to implement the proposed construction will result in continued permit violations, and will not protect the health of the citizens in the area.

The environmental review process, which is documented by the enclosed Environmental Assessment, indicates that no potential significant adverse environmental impacts will result from the proposed action. The project individually, cumulatively over time, or in conjunction with other actions will not have a significant adverse effect on the quality of the environment. On the basis of the environmental review determination that there are no predicted or cumulative significant adverse impacts associated with the project, I have determined that the project is not a major Federal action significantly affecting the quality of the human environment, and that preparation of an Environmental Impact Statement is not necessary. My preliminary decision is based upon the enclosed Environmental Assessment, a careful review of the Environmental Information Document prepared for the project, the result of the public participation process, and other supporting data which are on file in the office listed below and available for public review upon request. Therefore, I am issuing this preliminary Finding of No Significant Impact pertaining to project.

Comments supporting or disagreeing with my preliminary decision may be submitted for consideration to the attention of the Office of Planning and Coordination (6EN-XP), Environmental Protection Agency, 1445 Ross Avenue, Dallas, Texas 75202-2733. After evaluating any comments received, the Agency will make a final decision. No administrative action will be taken on this preliminary decision for at least 30 calendar days after release of this Finding of No Significant Impact. The preliminary decision and finding will then become final after the 30-day comment period expires if no new significant information is provided to alter this finding.

Responsible Official,

Gerald Fontenot, P.E
Acting Director
Compliance Assurance and Enforcement Division

cc: Ruth Fontenot, Mayor
City of New Iberia

Michael McDaniel, Secretary
Louisiana Department of Environmental Quality

Enclosures

ENVIRONMENTAL ASSESSMENT
CONSTRUCTION of WASTEWATER TREATMENT FACILITIES
for the
CITY of NEW IBERIA
located in
IBERIA PARISH, LOUISIANA
EPA PROJECT NUMBER: XP-986952-01

BACKGROUND

The city of New Iberia (city) is located in Iberia Parish which is in the extreme south central portion of the state. The city is located on both banks of Bayou Teche near U.S. Highway 90. The planning area for this project consists of the corporate limits of the city and Sewerage District Number 1 of Iberia Parish, and is shown on the maps enclosed as Figures 1 and 2. The Fiscal Years 2001, 2002, and 2003 Appropriations Act for the EPA included special Congressional funding for water and wastewater construction projects. The city was selected to receive funding through these special appropriations for the construction of new wastewater treatment facilities to replace their existing Admiral Doyle Drive treatment plant, and for the rehabilitation of their Parker Street treatment plant.

The city and Sewerage District 1 are served by both existing treatment facilities. The Admiral Doyle Drive plant has a treatment capacity of 3.6 million gallons per day (mgd), and is owned by the city. The Parker Street plant has a treatment capacity of 2.5 mgd, and is owned jointly by both the city and Sewerage District 1. Effluent from the Admiral Doyle Drive plant is discharged into Commercial Canal and ultimately into Vermillion Bay and the Intracoastal Canal, and the Parker Street plant discharges into Bayou Teche and Lake Fausse Pointe.

Both existing treatment facilities currently have adequate capacity to properly treat the flows generated by the residents in the area through the planning period of 2021, but will be unable to meet future effluent limits that will be required for the facilities. The new effluent limits are significantly more stringent than when the Admiral Doyle Drive and Parker Street facilities were first designed and constructed in 1942 and 1984, respectively. Both facilities become overloaded due to excessive infiltration during dry weather, and excessive infiltration and inflow during wet weather. Both treatment plants have experienced overflows of raw wastewater into the local environment. To correct this situation and to comply with future discharge permit limits, the city is proposing the construction of a new wastewater treatment plant capable of treating a wastewater flow of 6 mgd to replace the Admiral Doyle Drive treatment plant, and the construction of equalization basins at the Parker Street treatment plant.

The proposed project is considered to be a Federal action requiring compliance with the National Environmental Policy Act (NEPA). In accordance with the environmental review requirements of the Council on Environmental Quality found at 40 Code of Federal Regulations (CFR) Part 1500 and with the use as guidance of EPA's implementing regulations found at 40

CFR Part 6 entitled “Procedures for Implementing the Requirements of the Council on Environmental Quality on the National Environmental Policy Act”, the EPA is preparing this Environmental Assessment (EA) to assist in determining the environmental impacts of the proposed action, and in evaluating whether an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FNSI) will be prepared for the proposed project.

PURPOSE AND NEED

The construction of new wastewater treatment facilities to replace the Admiral Doyle Drive plant and the rehabilitation of the Parker Street plant will provide adequate and reliable wastewater treatment to serve the needs of the citizens in the area. Currently, both facilities experience overflows of raw untreated wastewater into the local environment creating a public health hazard. These sanitary sewer system overflows are caused by hydraulic overloading due to significant amounts of infiltration and inflow entering into the collection system. Despite recent rehabilitation efforts which have somewhat improved the situation, the treatment process will not be able to meet more stringent effluent limits in the future. The collection system will continue to deteriorate with age, and the wastewater treatment plants will continue to experience periods of high flow that affect the treatment processes. These factors reduce effluent quality and will continue to contaminate and deteriorate local surface and ground water resources. The project will enable the city to meet the wastewater treatment needs of its citizens through the planning year of 2021.

PROJECT DESCRIPTION

To meet more stringent effluent permit limits, the city is proposing to construct a new wastewater treatment plant capable of treating a wastewater flow of 6 mgd, and then to abandon the existing Admiral Doyle Drive treatment plant. The new facilities will utilize Sequencing Batch Reactor technology which will automate the wastewater treatment process. The wastewater flow currently treated at the Admiral Doyle Drive plant will be pumped to the new facilities through a new pump station to be constructed at the existing Admiral Doyle Drive facility. Sludge processing and treatment will continue at the Parker Street plant, and a new sludge storage tank will be constructed at the new facilities.

The new facilities will include units to perform preliminary treatment, Sequencing Batch Reactors with 8 reactor basins, tertiary filters with 10 filter cells, chlorination and dechlorination, and post aeration. The new treatment plant will be operated by city personnel currently operating the existing Admiral Doyle Drive plant. The personnel will receive extensive training in the proper operation of the various components to be constructed at the new treatment plant.

ALTERNATIVES TO THE PROPOSED PROJECT

The funding recipient evaluated and considered a range of various alternatives to address the infrastructure needs of the area. Important factors influencing the evaluation of the processes and their recommended solutions included environmental acceptability, overall costs, availability of land for the intended uses, maximum reuse of existing facilities when applicable, operation

and maintenance costs, system reliability, accommodation of future expansion needs, and public acceptance. Adherence to local, state and Federal regulations is of prime importance and concern to the funding recipient. The following is a discussion of the alternatives considered or evaluated during the development of the project.

A. No Action: The NEPA environmental review process requires consideration of the “no action” alternative. This alternative will allow the current public health concerns and environmental contamination to continue. The environmental consequences of taking “no action”, which would allow continued deterioration of the area, was compared with the benefits to be gained from the construction of the proposed project. Since taking “no action” is unresponsive to the current and future infrastructure needs of the funding recipient, and does not protect public health and environmental standards in the area, this alternative was **rejected** from further consideration in favor of implementing the proposed project.

B. Abandon the Admiral Doyle Drive Plant and Construct a New Pump Station and Force Main to Transport Wastewater Flow to New Location: This alternative has the advantage of removing all wastewater treatment operations to a more remote site not subject to development or encroachment. However, this alternative would involve large pump stations and excessively long force mains to pump the flow from the current site. Due to the excessive costs associated with the installation of this type of equipment, this alternative was **rejected** from further consideration.

C. Convert the Admiral Doyle Drive Plant to Treat a Portion of the Wastewater Flow: This alternative has the advantage of utilizing existing facilities and equipment, if possible, which would lower the overall costs of the project. However, most of the components and equipment associated with the existing plant are aging, have already exceed their useful service life, and will continue wastewater treatment process in the middle of the city. Due to excess costs associated with the operation and maintenance of older equipment, as well as the duplication of manpower, this alternative was **rejected** from further consideration.

D. Convert the Admiral Doyle Drive Plant into a Wet Weather Flow Equalization Facility: This alternative has the advantage of utilizing existing facilities and equipment, if possible, which would lower the overall costs of the project. However, since this method has the same disadvantages associated with Option C above, this alternative was **rejected** from further consideration.

E. Rehabilitate the City’s Entire Collection System: This alternative would allow the use of the existing equipment at the Admiral Doyle plant, but would continue wastewater treatment process in the middle of the city. However, the cost of this alternative was prohibitive. Due to excessive costs associated with a complete rehabilitation of the city’s collection system, this alternative was **rejected** from further consideration.

F. Abandon the Admiral Doyle Drive Plant and Divert All Flows to New Plant: This alternative has the advantage of eliminating outdated and expensive to operate equipment, and would remove the wastewater treatment process from the middle of the city. Even though this option

would require a new pump station at the existing location, this option has a lower overall cost and will accommodate the flows from both the current and future populations. Due to the cost savings associated with the installation of this type of equipment, this is the **preferred** alternative.

ENVIRONMENTAL SETTING

The population of the planning area in 2000 was 41,990 with a projected population of 53,800 by the year 2021. Iberia Parish is located in the extreme south central part of the state of Louisiana. The area extends from the Mississippi River Valley Flood Plains on the northeast to coastal wetlands on the southwest. The parish exhibits a variety of topography and physical features that are the result of the intersection of the salt marshes adjacent to the Gulf of Mexico to the south, the slightly higher prairie terraces to the north, and the western edge of the Mississippi River Delta overflow region to the east. The proposed project will be located in the north central portion of the parish.

The climate in the planning area is generally humid and sub-tropical. The yearly mean temperature is 68 degrees Fahrenheit. The summer months are quite warm, with July having the highest average monthly temperature of around 82 degrees. Summer temperatures rarely exceed 100 degrees, with the annual high temperature usually in the upper 90s. The winter months are usually mild with cold spells of short duration. Low winter temperatures rarely fall below the low twenties, and maximum winter temperatures seldom fail to rise above freezing. January has the lowest average monthly temperature of around 54 degrees. Snow is a negligible form of precipitation occurring only rarely.

Prevailing wind direction is southerly during most of the year, and generally light. The movement of air from the Gulf of Mexico and nearby bodies of water helps to moderate temperature extremes, and provides a source of moisture and rainfall. Rainfall is heavy in the area with a normal annual total of around 58 inches of precipitation. Amounts of rainfall are significant in all seasons, and extreme rainfall levels can occur in any month. Rains of an inch or more can occur monthly, and daily rains of up to 4 inches are not uncommon. Flooding is common in the area which contains numerous water bodies.

In 1999, the parish had a per capita personal income of \$20,470. This amount ranked the Parish 23rd in the state, and was 90 percent of the state average of \$22,839 and 72 percent of the national average of \$28,546. In 1989, the per capita personal income of the parish was \$12,402, ranking it 21st in the state. The parish has experienced employment growth over the last twenty years from wholesale trade, repair services, and social services. These industries have grown to accommodate the basic industries and growing population in the parish. The population is expected to continue to grow in the future.

IMPACTS OF THE PROPOSED PROJECT

The proposed project was analyzed to identify potential short-term, long-term, and cumulative impacts on the environment. Factors that were considered include the probability of

impact occurrence, magnitude of any occurrence, if any predicted occurrence is determined to be reversible/irreversible, direct/indirect or one-time/cumulative, the proposed action's conformity to legal mandates, and the social distribution of risks and benefits. The proposed project should not have a substantial negative impact upon current land uses or land values, nor should it have a substantial impact upon the values of surrounding land holdings. The proposed action is expected to have energy requirements typical of other construction projects of similar scope, size and duration, and will be conducted in accordance with the requirements of all local and state regulations.

The majority of the impacts associated with the proposed project will be short-term and temporary due to actual construction activities, and will cease immediately upon completion of construction work in any particular area. There are no significant adverse environmental impacts associated with the proposed action that cannot be reduced to acceptable levels. The only irretrievable resources committed to this project are labor, machinery wear, materials, funds spent, and energy consumed during construction. The potential short and long-term, direct, indirect and cumulative impacts resulting from the proposed action are identified and discussed below.

1. Biological Resources Including Threatened and Endangered Species: The proposed project was coordinated with both the United States Fish and Wildlife Service and the Louisiana Department of Wildlife and Fisheries (LDWF) concerning the protection of listed animal and plant species and their designated critical habitat. The LDWF stated that the Louisiana black bear is a threatened species known to occur in the area, and recommended the use of bear proof garbage containers. Since the project is located within the city limits of New Iberia in a heavily populated area, the bear is not expected to roam freely within the city limits. Therefore, Federal or state listed species or their habitats will not be adversely impacted by construction of the project.

2. Cultural/Historic Resources: The proposed project was coordinated with the State Historic Preservation Officer (SHPO) concerning the protection of sensitive resources with archaeological, historical, architectural, or cultural significance. Since these protected resources are not known to occur in the project area, cultural or historic resources will not be adversely impacted by construction of the project.

However, should materials, artifacts, or properties of a potentially historic or archaeological nature be unearthed during construction, work will stop immediately in that general vicinity, and the funding recipient will immediately notify the SHPO of the discovery. Any such resources discovered will be evaluated in accordance with the requirements of 36 CFR Part 800. Appropriate mitigation measures will be developed and implemented, as needed, in consultation with the SHPO before construction is allowed to continue.

3. Floodplain: The proposed project was coordinated with the local Floodplain Administrator (FA) and the Louisiana Department of Transportation and Development (LDOT&D) concerning the protection of the floodplain, and compliance with local floodplain management regulations. The FA stated that the project "will have no adverse effect" on the floodplain. The LDOT&D

stated that Iberia Parish is a participant in the National Flood Insurance Program (NFIP), and that the project must comply with Section 60.3 of the Iberia Parish Flood Damage Prevention Ordinance. Compliance with the local flood damage ordinance and the NFIP will insure that the floodplain will not be adversely impacted by construction of the project.

4. Wetlands: The proposed project was coordinated with the United States Army Corps of Engineers concerning the protection of jurisdictional wetlands. Since these protected resources are not known to occur in the project area, a Section 404 permit will not be required and wetlands will not be adversely impacted by construction of the project.

However, as additional means of insuring that proper consideration is afforded the need to protect the natural beneficial functions of floodplains and wetlands, as well as the need to minimize potential flood hazards to life and property, the construction funding is conditioned to read:

The recipient agrees that no wastewater generated by development located in the floodplains or wetlands shall be treated or transported by the project facilities for a period of 50 years. This restriction does not apply to development, which existed prior to the issuance date of the Finding of No Significant Impact related to this project;

The recipient agrees to adopt and enforce suitable ordinances and implementing procedures for effective local administration of this floodplains and wetlands service area restriction. On application of the recipient's governing body and after considering all relevant information on a proposed development's effects on the natural functions and values of the affected floodplain, the EPA Regional Administrator may waive the service area restriction in individual cases; and

EPA and the recipient intend that this floodplains and wetlands service area restriction shall benefit any person, organization, or entity possessing an interest in preservation of the natural environment in the 100-year floodplains and wetlands subject to this restriction. Any such beneficiary may seek enforcement of the restriction against the recipient or its successor in a court of competent jurisdiction if notice of the intent to seek enforcement is first given the recipient and EPA Region 6 and neither entity initiates corrective action within 90 days of receiving such notice.

5. Surface Water Resources: The proposed project was coordinated with both the National Park Service and the Louisiana Department of Environmental Quality concerning the protection of surface water resources. Effluent will not be discharged into waters which have been designated as a wild and scenic river. Since these protected resources are not known to occur in the project area, surface water resources will not be adversely impacted by construction of the project.

6. Ground Water Resources: The proposed project was coordinated with both the United States Environmental Protection Agency, Ground Water/UIC Section, and the Louisiana Department of Environmental Quality concerning the protection of ground water resources. Even though the project is located over the Chicot Aquifer which has been designated as a sole source aquifer,

ground water resources will not be adversely impacted by construction of the project.

7. Prime and Unique Farmlands: The proposed project was coordinated with the Natural Resources Conservation Service concerning the protection of prime and/or unique farmlands. The soils in the immediate area of the project site have been classified as prime farmland. However, since the land that will be used for the new treatment plant has been annexed by the city, the land will be categorized as urban land, and will be exempted from the rules and regulations of the Farmland Protection Policy Act of 1983. Since the land will be reclassified prior to use, prime and/or unique farmlands will not be adversely impacted by construction of the project.

8. Air Quality: The project was coordinated with the Louisiana Department of Environmental Quality concerning the protection of air quality. The project is located in an attainment area which is in compliance with the National Ambient Air Quality (NAAQS) standards for all criteria air pollutants. All vehicles and equipment used in the construction of the project must comply with the regulations concerning control of air pollution from mobile sources. Since the project will not violate NAAQS, air quality will not be adversely impacted by construction of the project.

9. Environmental Justice: The proposed project was reviewed for compliance with Executive Order 12898 entitled "Federal Actions to Address Environmental Justice (EJ) in Minority and Low-Income Populations". Potential environmental impacts to minority and low-income communities were evaluated using Geographical Information System maps, census demographic data, and a mathematical formula to rank the project for EJ impacts. The project will serve all populations equally and will be constructed in a manner to ensure that no persons or populations will be discriminated against or denied the benefits of the project because of their race, color, income level, or national origin. There will be no adverse impacts that are considered disproportionate to any particular population(s) based on ethnicity or income.

10. Coastal and Barrier Resources: The proposed project was coordinated with the Louisiana Department of Natural Resources (LDNR) concerning the protection of coastal areas and resources such as islands, beaches, transitional areas, inter-tidal areas, salt marshes, and ecologically sensitive coastal barriers. The LDNR stated that the project is located outside the Louisiana Coastal Zone, and will not require a conformity determination for consistency with coastal zone management requirements. Since these protected resources are not known to occur in the project area, coastal and barrier resources will not be adversely impacted by construction of the project.

11. Cumulative Impacts: Potential cumulative impacts would be those impacts to the local environment that would result from the proposed project in combination with other ongoing actions, and those reasonably foreseeable future actions. No other major construction activity is being conducted presently or planned for the immediate future. The proposed project will not individually nor cumulatively over time have a negative impact on the quality of the human or natural environment. To the contrary, improved infrastructure will have a positive environmental impact by enhancing public health, and protecting the local environment from

continued contamination.

DOCUMENTATION, COORDINATION, AND PUBLIC PARTICIPATION

A public hearing for the proposed project was held on October 23, 2002, at the New Iberia City Hall. The purpose of the meeting was to inform the public of the proposed project, to identify any issues of concern, and to request public participation in the development of the project. Since the project is supported by the community, no adverse public comments or concerns were received during the hearing.

During the process of conducting the environmental review and preparing this EA for the project, coordination has been conducted with all required resource protection agencies and offices to solicit and incorporate their initial review and comments, if any. Copies of this EA will be provided to those agencies and offices for their final review and comments, if any. Other interested parties may request a copy of the EA in writing from the EPA, Office of Planning and Coordination (6EN-XP), 1445 Ross Avenue, Dallas, Texas 75202-2733.

References

1. Environmental Information Document, City of New Iberia, Iberia Parish, December 2002.
2. Facility Plan Update, City of New Iberia, Iberia Parish, December 2002.

RECOMMENDATION

Based upon completion of this Environmental Assessment, and a detailed review of the supporting information contained in the Environmental Information Document, the Public Hearing Responsiveness Summary and the Facility Plan which were prepared for the project, and other pertinent technical, engineering and administrative documentation, the proposed project is considered to be cost-effective and environmentally sound. Therefore, it is recommended that a Finding of No Significant Impact be issued for this project.